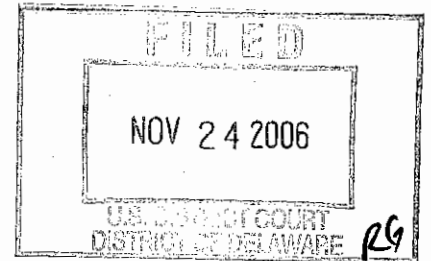


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al., :
Plaintiffs, :
v. : Civil action No. 05-823 (KAJ)
STANLEY TAYLOR, et al., :
Defendants :

REQUEST FOR PRODUCTION OF DOCUMENTS

TO: STANLEY TAYLOR, et al.



PLEASE TAKE NOTICE that the Plaintiffs, pursuant to the Federal Rule Civil Procedure Rule 26(a) request that the Defendants, produce for inspection, copying, or photographing the following documents:

1. All documents, incident reports and/or work orders regarding complaints of high temperatures and high heat at the Sussex Correctional Institution (SCI), Kitchen Unit since the year of 1997.
2. All written memoranda or correspondence between the Department of Corrections' (DOC) food service employees at SCI regarding the conditions which forms the subject matter of the Complaint.
3. Produce the Delaware Correctional Association Contractual Agreement, the article or section in regards to maintaining a safe work environment.
4. Any and all written policies and/or procedures concerning the responsibility of the Defendants and representatives' of the Defendants to initiate and maintain such programs as may be necessary to maintain a safe work environment at the SCI kitchen.
5. All transcripts of interview by any correctional personnel regarding the alleged bad condition which is the subject of this lawsuit.

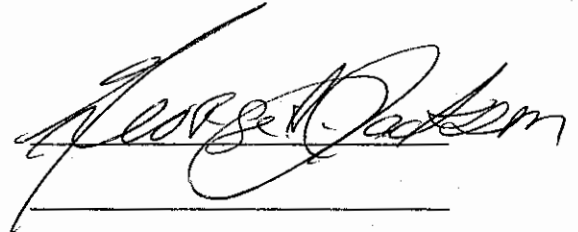
Any logs, books, documents, tapes, or other tangible evidence of communication between representatives' of the Defendants and the Defendants concerning the alleged bad condition at SCI main kitchen Unit.

6. Produce any training manual or training program that instructed the State Defendants in the recognition and avoidance of unsafe conditions and the regulations applicable to their work environment to control or eliminate any hazard or other exposure to illness or injury.

7. Produce all SCI Main kitchen log books since 1996, and any other documents which maintain recorded temperatures at the SCI Main kitchen.

Date:

11/21/06



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al)	
)	
Plaintiffs,)	
)	C.A. No. 05-823- KAJ
v.)	
)	
STANLEY TAYLOR, et al.,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2006, Plaintiffs forward PRODUCTION
OF DOCUMENTS to the defendants by placing said copy in pre-stamped envelope
in place in the U.S. mail box at the SCI prison, to be forward to:

Eileen Kelly, I.D. #2884
Deputy Attorney General
Carvel State Office Building
820 North French Street, 6th floor
Wilmington, DE 19801
Attorney for Defendants



George A. Jackson
IM ~~George A.~~ Bldg.
SUSSEX CORRECTIONAL INSTITUTION
P.O. BOX 500
GEORGETOWN, DELAWARE 19947

S.M.S.
R.A.

U.S. District Court
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